

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

BLACKWATER SECURITY CONSULTING,
LLC, a Delaware Limited Liability Company; and
BLACKWATER LODGE AND TRAINING
CENTER, INC., a Delaware Corporation,

Plaintiffs,

v.

WESTCHESTER SURPLUS LINES INSURANCE
COMPANY, a Georgia Corporation; EVANSTON
INSURANCE COMPANY, an Illinois Corporation;
FIDELITY AND CASUALTY COMPANY OF
NEW YORK, a South Carolina Corporation; and
LIBERTY INSURANCE UNDERWRITERS, a
Massachusetts Corporation,

Defendants.

CIVIL ACTION NO. 05-CV-06020

DECLARATION OF CHRISTOPHER J. TELLNER

I, Christopher J. Tellner, upon oath depose and state as follows:

1. I am an associate with the law firm of Post & Schell, P.C. I make this Declaration in support of the Supplemental Brief of Defendant Liberty International Underwriters in Support of its Motion for Summary Judgment as to Coverage Issue. I have personal knowledge of all of the facts set forth in this Declaration.

2. I have attached as Exhibit A a true and correct copy of relevant portions of the testimony of Blackwater CEO, Erik Prince (Oct. 2, 2007).

3. I have attached as Exhibit B a true and correct copy of a letter from Blackwater, via its counsel Stephen M. Ryan of the law firm McDermott Will & Emery, to the Honorable

Henry A. Waxman, Chairman, House Committee on Oversight and Government Reform (Sept., 24, 2007).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

/s/ Christopher J. Tellner
Christopher J. Tellner

Executed on October 11, 2007